

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
FIRST INTERIM POST-DISMISSAL FEE APPLICATION COVER
SHEET FOR THE PERIOD
AUGUST 12, 2023 THROUGH JANUARY 31, 2024**

Debtor: LTL Management LLC Applicant: Genova Burns LLC
Case No.: 22-12825(MBK) Client: Official Comm of Talc Claimant
Chapter: 11 Case Filed: April 4, 2023

**SECTION 1
FEE SUMMARY**

Interim Post-Dismissal Fee Application No. 1 or Final Fee Application

Summary of Monthly Amounts Requested for the Period from August 12, 2023 through January 31, 2024

	<u>FEES</u>	<u>EXPENSES</u>
Total Previous Fee Requested:	\$ <u>95,015.00**</u>	\$ <u>4,512.60</u>
Total Fees Allowed To Date:	\$ <u>0.00</u>	\$ <u>0.00</u>
Total Retainer (If Applicable)	\$ <u>N/A</u>	\$ <u>N/A</u>
Total Holdback (If Applicable)	\$ <u>19,067.00</u>	\$ <u>0.00</u>
Total Received By Applicant	\$ <u>63,143.00</u>	\$ <u>4,496.60</u>
Total Additional fees requested (Not previously requested by monthly fee Statements)*	\$ <u>30,400.00*</u>	\$ <u>215.60</u>

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years Of Professional Service)	HOURS	RATE	FEE
1. Daniel M. Stolz, Partner	1980	80.70	800.00	64,560.00
2. Daniel M. Stolz, Partner	1980	1300	900.00	11,700.00
3. Donald W. Clarke, Partner	2008	45.30	600.00	27,180.00
4. Scott S. Rever, Counsel	1994	.80	600.00	480.00
5. Gregory S. Kinoian, Counsel	1992	14.40	600.00	8,640.00
6. Sydney S. Schubert, Junior Associate	2022	8.50	275.00	2,337.50
7. Lorrie Denson	Paralegal	31.00	250.00	7,750.00
8. Lorrie Denson	Paralegal	10.50	275.00	2,887.50

Fee Totals:	<u>\$ 125,415.00</u>
Disbursements Totals:	<u>\$ 4,728.20</u>
Total Fee Application	<u>\$ 130,143.20</u>

*Total additional fees requested for this time period in the amount of \$30,400.00 for fees plus \$215.60 for expenses were not previously requested in monthly fee statements. This additional time was for necessary, non-appellate administrative tasks performed by Genova Burns.

**The fees for appellate work were charged at 100% and paid 80% on a monthly basis, pursuant to agreement with LTL, and the non-appellate work will be paid at the rate of 50%. This fee application requests the 20% holdback on appellate work performed, and 50% of the necessary, non-appellate administrative tasks performed.

**SECTION II SUMMARY
OF SERVICES**

SERVICES RENDERED	HOURS	FEE
a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.		
b) Asset Disposition Sales, leases, abandonment and related transaction work.		
c) Avoidance Action Litigation Preference and fraudulent transfer litigation.		
d) Business Operations Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.		
e) Case Administration Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	128.40	91,187.50
f) Claims Administration and Objections Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.		
g) Employee Benefits/Pensions Review issues such as severance, retention, 401K coverage and continuance of pension plan.		
h) Fee/Employment Applications Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	56.00	21,867.50
i) Fee/Employment Objections Review of an objections to the employment and fee applications of others.	13.90	8,340.00
j) Financing Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.		
k) Litigation Other than Avoidance Action Litigation (there should be a separate category established for each major matter).	3.70	2,460.00
l) Meetings of Creditors Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' committee meetings.	2.60	1,560.00
m) Plan and Disclosure Statement Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.		

SERVICES RENDERED	HOURS	FEE
n) Relief from Stay Proceedings Matters relating to termination or continuation of automatic stay under 362.		
o) Accounting/Auditing Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.		
p) Business Analysis Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.		
q) Corporate Finance Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.		
r) Data Analysis Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.		
s) Litigation Consulting Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.		
t) Reconstruction Accounting Reconstructing books and records from past transactions and bringing accounting current.		
u) Tax Issues Analysis of tax issues and preparation of state and federal tax returns.		
v) Valuation Appraise or review appraisals of assets.		
w) Travel Time		
SERVICE TOTALS:	204.60	\$125,415.00

SECTION III SUMMARY OF DISBURSEMENTS

DISBURSEMENTS	AMOUNT
a) Filing Fees Payable to Clerk of Court.	
b) Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated.	
c) Pacer Fees Payable to the Pacer Service Center for search and/or print.	215.60
d) Fax Include per page fee charged.	

e) Case Specific Telephone/Conference Call Charges Exclusive of overhead charges.	
f) In-house Reproduction Services Exclusive of overhead charges.	
g) Outside Reproduction Services Including scanning services.	
h) Other Research Title searches, UCC searches, Asset searches, Accurint.	
i) Court Reporting Transcripts.	3,725.20
j) Travel Mileage, tolls, airfare, parking.	
k) Courier & Express Carriers Overnight and personal delivery.	
l) Postage	
m) Other (specify) Litigation support vendors, other professionals	787.40
DISBURSEMENTS TOTAL:	\$4,728.20

I certify under penalty of perjury that the above is true.

Date: April 4, 2024

/s/ Daniel M. Stolz
DANIEL M. STOLZ